

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NETFLIX, INC.,

Movant,

v.

FORTRESS INVESTMENT GROUP LLC,
DIVX CF INVESTORS LLC,

Respondents.

Miscellaneous No. 1:25-mc-00230

Underlying Litigation:

DivX, LLC v. Netflix, Inc., No. 2:19-
cv-1602-GW (DFMx) (C.D. Cal.)

**DECLARATION OF BRITTANY BLUEITT AMADI IN SUPPORT OF NETFLIX'S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS PURSUANT TO
SUBPOENAS**

I, Brittany Blueitt Amadi, declare as follows:

1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Netflix, Inc. ("Netflix") in this matter. I make this declaration based on my personal knowledge and in support of Netflix's Motion to Compel Production of Documents Pursuant to Subpoenas.

2. I am personally familiar with the facts set forth in this declaration. If called as a witness, I could and would competently testify to the matters stated herein.

3. Netflix served subpoenas on the Fortress Investment Group LLC and DivX CF Investors LLC (collectively, "Fortress") on August 5, 2024. On September 20, 2024, Fortress made its initial document production. Since then, Netflix has met and conferred with Fortress four times and sent Fortress six letters regarding deficiencies it identified in Fortress's document production. True and correct copies of those letters are attached to this declaration as Exhibit Nos. 20-25.

4. Attached hereto as Exhibit 1 is a true and correct copy of DivX, LLC's First Amended Complaint in the underlying litigation, *DivX, LLC v. Netflix, Inc.*, No. 2:19-cv-1602-GW (DFMx) (C.D. Cal.).

5. Attached hereto as Exhibit 2 is a true and correct copy of the subpoena served on Fortress Investment Group LLC by Netflix on August 5, 2024.

6. Attached hereto as Exhibit 3 is a true and correct copy of the subpoena served on DivX CF Investors LLC by Netflix on August 5, 2024.

7. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff DivX's Second Supplemental Notice of Interested Parties in the underlying litigation.

8. Attached hereto as Exhibit 5 is a true and correct copy of a Secretary of State Certificate of Formation of DivX CF Holdings LLC, Bates No. FIG0001137.

9. Attached hereto as Exhibit 6 is a true and correct copy of a Secretary of State Certificate of Formation of DivX CF Investors LLC, Bates No. FIG0001152.

10. Attached hereto as Exhibit 7 is a true and correct copy of a Secretary of State Certificate of Amendment of DivX CF Investors LLC, Bates No. DIVX0002058.

11. Attached hereto as Exhibit 8 is a true and correct copy of a screenshot of Fortress Investment Group LLC's website, last accessed May 19, 2025.

12. Attached hereto as Exhibit 9 is a true and correct copy of the LinkedIn profile of Peter Briger.

13. Attached hereto as Exhibit 10 is a true and correct copy of the LinkedIn profile of Constantine Dakolias.

14. Attached hereto as Exhibit 11 is a true and correct copy of the LinkedIn profile of Marc Furststein.

15. Attached hereto as Exhibit 12 is a true and correct copy of the LinkedIn profile of David Prael.

16. Attached hereto as Exhibit 13 is a true and correct copy of the LinkedIn profile of Jennifer Sorkin.

17. Attached hereto as Exhibit 14 is a true and correct copy of the LinkedIn profile of Megan Johnson.

18. Attached hereto as Exhibit 15 is a true and correct copy of the LinkedIn profile of Jason Meyer.

19. Attached hereto as Exhibit 16 is a true and correct copy of the LinkedIn profile of Scott Sivers.

20. Attached hereto as Exhibit 17 is a true and correct copy of the LinkedIn profile of Daniel Bass.

21. Attached hereto as Exhibit 18 is a true and correct copy of the LinkedIn profile of David Brooks.

22. Attached hereto as Exhibit 19 is a true and correct copy of a Letter from Mark Wilson to Brittany Amadi, dated May 12, 2025.

23. Attached hereto as Exhibit 20 is a true and correct copy of a Letter from Brittany Amadi to Mark Wilson, dated December 13, 2024.

24. Attached hereto as Exhibit 21 is a true and correct copy of a Letter from Brittany Amadi to Mark Wilson, dated February 10, 2025.

25. Attached hereto as Exhibit 22 is a true and correct copy of a Letter from Brittany Amadi to Mark Wilson, dated March 11, 2025.

26. Attached hereto as Exhibit 23 is a true and correct copy of a Letter from Brittany Amadi to Mark Wilson, dated April 30, 2025.

27. Attached hereto as Exhibit 24 is a true and correct copy of a Letter from Brittany Amadi to Mark Wilson, dated May 9, 2025.

28. Attached hereto as Exhibit 25 is a true and correct copy of a Letter from Brittany Amadi to Mark Wilson, dated May 14, 2025.

29. Attached hereto as Exhibit 26 is a true and correct copy of a Letter from Mark Wilson to Brittany Amadi, dated August 27, 2024.

30. Attached hereto as Exhibit 27 is a true and correct copy of [REDACTED]

31. Attached hereto as Exhibit 28 is a true and correct copy of [REDACTED]

32. Attached hereto as Exhibit 29 is a true and correct copy of [REDACTED]

33. Attached hereto as Exhibit 30 is a true and correct copy of [REDACTED]

34. Attached hereto as Exhibit 31 is a true and correct copy of [REDACTED]

35. Attached hereto as Exhibit 32 is a true and correct copy of [REDACTED]

[REDACTED]

36. Attached hereto as Exhibit 33 is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED]

37. Attached hereto as Exhibit 34 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED].

38. Attached hereto as Exhibit 35 is a true and correct copy of [REDACTED]

[REDACTED]

39. Attached hereto as Exhibit 36 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

40. Attached hereto as Exhibit 37 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

41. Attached hereto as Exhibit 38 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

42. Attached hereto as Exhibit 39 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 20, 2025



Brittany Blueitt Amadi